

UNITED STATES DISTRICT COURT

DISTRICT OF OREGON

UNITED STATES OF AMERICA

Case No. 6:22-cr-00262-MC

v.

PROTECTIVE ORDER

**MICHAEL MALEKZADEH and
BETHANY MOCKERMAN**

Defendants.

This matter came before the Court upon the government's unopposed motion for a protective order pursuant to Fed. R. Crim. P. 16(d)(1) to govern the discovery material in this case. Good cause having been shown in the government's motion,

IT IS HEREBY ORDERED that defense counsel of record, their investigators, assistants, and employees may review with defendants all discovery material produced by the government, and defendants may review unredacted discovery material, but counsel shall not provide defendants with copies of any unredacted discovery material produced by the government which contains:

- a. personal identifying information of any individual, including without limitation, any individual's date of birth, social security number, address, telephone number, email address, driver's license number, professional license number, or family members' names ("Personal Information") unless it belongs to the defendant or unless defense counsel first redacts the Personal Information from the discovery material; or

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b. financial information of any individual or business, including without limitation, bank account numbers, credit or debit card numbers, account passwords, account names and contact information, account history, account balances, account statements, tax return information, or taxpayer identification numbers (“Financial Information”) unless it belongs to the defendant, or unless defense counsel first redacts the Financial Information from the discovery material;

unless the Personal Information or Financial Information has first been entirely redacted from the discovery materials. This order does not apply to documents defendants already possess or independently have access to.

IT IS FURTHER ORDERED that neither defense counsel nor defendants shall provide any discovery material produced by the government to any third parties (i.e., persons who are not a party to this case), nor make any public disclosure of the same, without the government’s express written permission, except that defense counsel may provide discovery material to those persons employed by defense counsel who are necessary to assist counsel of record in preparation for trial or other proceedings.

Dated: January ____, 2023

MICHAEL J. McSHANE
United States District Judge

Respectfully submitted,
NATALIE K. WIGHT
United States Attorney

/s/ Gavin W. Bruce
GAVIN W. BRUCE, OSB #113384
Assistant United States Attorney

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